

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

Caption in Compliance with D.N.J. LBR 9004-2(c)

The Law Offices of S. Daniel Hutchison
135 North Broad Street
Woodbury, NJ 08096
(856) 251-1235

S. Daniel Hutchison, Esquire
Attorney for Debtor

In Re:

Robert B. Ferrell Jr.

Case No: 18-16629

Hearing Date:

Judge: ABA




**Order Filed on February 1, 2019
by Clerk
U.S. Bankruptcy Court
District of New Jersey**

CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION OF PLAN

The relief set forth on the following pages, numbered two (2) through three (3) is
hereby ORDERED.

DATED: February 1, 2019



**Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court**

THIS MATTER having come before the Court by Robertson Anschutz & Schneid P.L., attorneys for Deutsche Bank National Trust Company as Trustee for the Registered Holders of Morgan Stanley ABS Capital I Inc. Trust 2007-NC3 Mortgage Pass-Through Certificates, Series 2007-NC3, by the filing of the Objection to Confirmation of Debtor's Chapter 13 Plan, and the Debtor, Robert B. Ferrell Jr. being represented by S. Daniel Hutchison, Esq.; and the parties have come to a resolution and for good cause shown:

It is on this ____ day of _____, 2018, ORDERED as follows:

1. The Trustee is authorized not to pay the secured arrearage claim in the amount of \$310,142.91 as provided for in the Proof of Claim filed on June 8, 2018 (Claim No. 9) on behalf of Deutsche Bank National Trust Company as Trustee for the Registered Holders of Morgan Stanley ABS Capital I Inc. Trust 2007-NC3 Mortgage Pass-Through Certificates, Series 2007-NC3, so the debtor can complete the loan modification process. Should the debtor be offered a permanent loan modification, the loan modification must be completed and approved no later than August 1, 2018 or other date as allowed by the Court.

2. If the loan modification is approved, the debtor shall file a modified Chapter 13 Plan, together with an amended Schedule J reflecting debtor's post loan modification budget, within thirty (30) days of the approval of the final loan modification agreement.

3. If the loan modification is not approved by August 1, 2018 or other date as allowed by the Court, then the debtor shall do one of the following: (1) file a modified Chapter 13 Plan to cure the arrearage claim; (2) file a modified Chapter 13 Plan to

surrender the property subject to this claim; (3) file a Notice to Convert to Chapter 7; or
(4) file a Notice to Dismiss Case.

4. The Parties agree that consent to entry of the within order does not waive the debtor's right to object to Deutsche Bank National Trust Company as Trustee for the Registered Holders of Morgan Stanley ABS Capital I Inc. Trust 2007-NC3 Mortgage Pass-Through Certificates, Series 2007-NC3's Proof of Claim pursuant to D.N.J. Local Bankruptcy Rule 3007-1(b). In the event that an objection is filed, the debtor agrees to amend his Chapter 13 Plan to be consistent with the resolution of the Claim Objection.

5. This Order shall be incorporated in and become a part of any Order Confirming Plan in the herein matter.

The undersigned hereby consent to the form,
Content and entry of the within Order:

/s/S. Daniel Hutchison
S. Daniel Hutchison, Esq.
Attorney for Debtor
Date: 02/01/2019

/s/Aleisha C. Jennings
Aleisha C. Jennings, Esq.
Attorney for Creditor
Date: 12/21/2018

Certificate of Notice Page 4 of 4
United States Bankruptcy Court
District of New Jersey

In re:
Robert B. Ferrell, Jr.
Debtor

Case No. 18-16629-ABA
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-1

User: admin
Form ID: pdf903

Page 1 of 1
Total Noticed: 1

Date Rcvd: Feb 01, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Feb 03, 2019.

db +Robert B. Ferrell, Jr., 123 W Tomlin Station Road, Mickleton, NJ 08056-1320

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Feb 03, 2019

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on February 1, 2019 at the address(es) listed below:

Aleisha Candace Jennings on behalf of Creditor DEUTSCHE BANK NATIONAL TRUST Court claim no. (if known): NA COMPANY, AS TRUSTEE FOR THE REGISTERED HOLDERS OF MORGAN STANLEY ABS CAPITAL I INC. TRUST 2007-NC3 MORTGAGE PASS-THROUGH CERTIFICATES, SERI ajennings@rasflaw.com
Aleisha Candace Jennings on behalf of Creditor Deutsche Bank National Trust Company, as trustee for the registered holders of Morgan Stanley ABS Capital I Inc. Trust 2007-NC3 Mortgage Pass-Through Certificates, Series 2007-NC3 ajennings@rasflaw.com
Denise E. Carlon on behalf of Creditor The Bank of New York Mellon as Trustee for CWABS, Inc. Asset-Backed Certificates, Series 2007-7 dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com
Isabel C. Balboa on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com
Rebecca Ann Solarz on behalf of Creditor The Bank of New York Mellon as Trustee for CWABS, Inc. Asset-Backed Certificates, Series 2007-7 rsolarz@kmlawgroup.com
S. Daniel Hutchison on behalf of Debtor Robert B. Ferrell, Jr. sdhteamlaw@outlook.com, backupcourt@outlook.com;sdhlawparal@outlook.com;hutchisonrs39026@notify.bestcase.com
Sindi Mncina on behalf of Creditor Deutsche Bank National Trust Company, as trustee for the registered holders of Morgan Stanley ABS Capital I Inc. Trust 2007-NC3 Mortgage Pass-Through Certificates, Series 2007-NC3 smncina@rascrane.com
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 9